

The Honorable Tiffany M. Cartwright

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

MOZZY CLARK,

Plaintiff,

v.

STATE OF WASHINGTON, DEPARTMENT  
OF CORRECTIONS; LT. DENNIS SIMONS;  
SGT. REGINA WILLIAMS A/K/A REGINA  
ESPERANZA AVELLAR; HEIDI  
WHITTEMORE; OFFICER THERESA  
AYOTTE; OFFICER MICHAEL BROOKS; and  
DOES 1-10.

Defendants.

No.: 3:24-CV-06058-TMC

STIPULATED DISMISSAL WITH  
PREJUDICE AND WITHOUT FEES  
OR COSTS AS TO DEFENDANT  
REGINA WILLIAMS, A/K/A REGINA  
ESPERANZA AVELLAR ONLY

COME NOW the parties, by and through their counsel of record, and hereby stipulate and agree pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) that all claims against the Defendant, REGINA WILLIAMS a/k/a REGINA ESPERANZA AVELLAR, be dismissed with prejudice, and without fees or costs to either party.

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STIPULATED DISMISSAL WITH  
PREJUDICE AND WITHOUT FEES OR  
COSTS AS TO DEFENDANT REGINA  
WILLIAMS, A/K/A REGINA  
ESPERANZA AVELLAR ONLY –  
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DATED this 13th day of March, 2025.

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**PROOF OF SERVICE**

I certify that on March 13, 2025 I electronically filed the foregoing with the Court through CM/ECF and served on all parties or their counsel of record a copy of this document addressed as follows:

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I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 13th day of March, 2025 at Olympia, WA.

/s/ Jenny Singleton

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